NARRATIVE INSPECTION REPORT DOCUMENT

Date of Inspection: November 22, 1988 Inspector: Rich Johnson

Site Code: IEC #1178020003 County: Macoupin RJ

Site Name: Brighton/Brighton Landfill

GENERAL REMARKS

The following information is provided in the same sequence as the questions shown on the "RCRA Inspection Narrative".

No. 1. Describe the products made, services provided, etc.

The facility has only operated as a landfill. Brighton Landfill has accepted both hazardous and non-hazardous waste. Under a Circuit Court Order, the landfill was to cease accepting any waste after December 20, 1985 (see Item 4 for details). The facility had already ceased taking hazardous waste by November 8, 1985, because they had not been able to maintain their interim status.

No. 2. Describe how and where each waste has been accumulated and/or stored.

Currently, the only waste apparently accumulated is waste oil. It was being accumulated in both a mobile aboveground tank (i.e. a container pursuant to 35 Illinois Administrative Code (Ill. Adm. Code) 720.110 and 2 55-gallon drums.

No. 3. Describe how and where each waste is or has been treated and/or disposed.

The facility has only operated as a landfill. There are no accurate records of where the hazardous wastes were placed.

The following is a summary of the wastes accepted at the landfill (by generators).

Olin (from Alton)

Authorization No.	General Waste Name	Hazardous Waste No.
79-2386	Shot tower cob meal	D008
81-1744	Walnut shells	D008
81-2607	Baghouse dust	D006
82-1766	Pigment composite	D008
81-0631	Ballistic sand	D008
82-2246	Shell components	D008
82-0867	Bur saddles	D008
81-2472	Shot tower refractory brick	D008
83-0623	Zone 3 baghouse dust	D008
83-0661	Zone 3 incinerator ash	D008
83-0922	Pre-heat salt	D005
-	High speed salt	D005
-	Quench salt	D005
83-0992	Zone 17 baghouse bags	D006
81-0633	Lead contaminated filters	D008
82-0899	#2 standard red pigment #400	D006
81-0863	Zone 4 incinerator residue	D008
82-0868	T-242 kill sump sludge	D008
81-1968	Zone 6 WWT Vacuum Filter Sludge	D008
81-2481	WW Tumbling media	D008
82-0871	Zone 4 MRF	D008
82-2246	Lead wads	D008
-	Zone 17 settling pit sludge	D008

Owens Illinois (from Alton)

82-0635	Furnace checker dust	D006
"	Oil base ink	?

Amoco (Wood River)

83-1336	Jet fuel tank bottoms	D008

Duncan Foundry & Machine Works (Alton)

83-1335	Baghouse dust	D008

W. H. Maze Co.

83-2102	Chromate rinse	D007

Authorization No.	General Waste Name	Hazardous Waste No.
	Oliver L. Anderson Hospital (Maryville)	
-	Incinerator ash	D006 & D008
	Shell Oil	
-	Catalyst fines	-
	Precision National Corporation (Mt. Vernon)	
-	Chrome Sludge	D007
	Wastex (East St. Louis)	
-	Waste sealer B	D008
	Trade Waste Incinerator (Sauget)	
83-1084	Roasted gravel	D008
	FMC	
-	Heavy paint sludge	-
	Laclede (Alton)	
-	Digested sludge	-
-	Baghouse dust	-

The above information had been previously reviewed from Agency microfiche. Included on the list are those wastes which were represented as hazardous on the microfiche and that had an entry showing gallons accepted at the landfill. It should be noted that the landfill ceased taking hazardous waste just prior to November 8, 1985. The landfill stopped accepting any waste by December 20, 1985, in response to a Circuit Court Order 81-CH-10, signed by Judge Joseph Koval. The Agency was not a party to the lawsuit that resulted in the Circuit Court Order.

No. 4. Describe and explain any unusual events, occurrences, or applications of the regulations.

The Circuit Court Judgment Order, signed 12/20/85, required that the landfill:

a. Cease taking any further refuse at the site. This appears to have been complied with.

b. Seal the southwest trench along Site 2 and the monitor wells within 180 days (about 6/18/86). The landfill has apparently completed filling most of the trench with cover material. The permeable zone has apparently been sealed. Mr. Evans had previously said that no waste had been deposited in the trench. The trench was apparently just filled with excavated soil. All monitoring wells have been sealed. Mr. Evans had been unable to give a specific date when the last well was sealed.

c. It was previously noted that openly dumped refuse located adjacent to the site had been cleaned up.

d. Closure progress reports were to be sent to the Court and Plaintiffs. The first report was due 120 days after the Order (about 4/19/86) and the second report 240 days after the Order (8/17/86). The Agency has never received copies of these progress reports.

e. Surface water sampling to monitor the stream was to be conducted in February 1986 and thereafter every May, August, November and February through the post-closure period. It is not known if the landfill is complying with this because the IEPA does not receive copies of any sample results.

f. The landfill was to complete closure activities by 12/19/86. This has apparently been accomplished in 1988. In talking to Mr. Evans it was learned that he has gone to Circuit Court for extensions of the closure completion date. The last Court appearance was said to have been 7/12/88. The Court approved closure plan indicated that 2 feet of compacted low permeable cover with 2 inches of topsoil was to be applied at the landfill. Mr. Evans indicated the required amount of cover has been applied. Under the Court approved closure plan the cover was to be probed subsequent to compaction of final cover to assure the required two foot of final cover. An engineering report by M. Rapps and Associates verifies that the closure activities have been completed in accordance with the closure plan included in the Circuit Board Order.

The landfill has also been subject to an enforcement case by the USEPA. In a Consent Agreement and Final Order (V-W-R-O-82) signed September 10, 1985, the owner/operator stipulated that they would:

a. Pay a $15,000 penalty. This has been done.

b. Provide the USEPA with a summary of the groundwater monitoring data obtained during the landfill's interim status period.

c. Provide the USEPA with a plan and implementation schedule for a groundwater monitoring program capable of providing the information required in 270.14(c)(2) through 270.14(c)(4). The landfill has

submitted a "Groundwater Monitoring and Contamination Assessment Plan" that was developed by John Mathes & Associates in 1985. It appears that the plan was never implemented.

d. Submit to the USEPA information required by 270.14(c)(2) through 270.14(c)(8). The landfill's "Groundwater Monitoring and Contamination Assessment Plans for Com-Pak" submitted to the IEPA and USEPA indicates it provides information required in 270.14(c)(2) through 270.14(c)(4).

e. Submit to the IEPA a plan for a groundwater monitoring program. This is discussed in the previous paragraph.

f. Achieve compliance with the following within 30 days of the signing of the Consent Agreement and Final Order:

1. Conduct inspections of the incoming hazardous waste to assure that it matches the identity of the waste specified in the manifest. This is no longer applicable because the landfill no longer receives wastes.

2. Develop and follow a written analysis plan for collecting runoff liquid. The facility has developed a plan called the "Excess Rainwater Analysis/Disposal Plan." The plan is deemed deficient.

3. Install an artifical barrier which completely surrounds the facility. It was noted during the present inspection that a section of the fence on the east side has been replaced. An area of fence had been missing on the previous inspection.

4. Train all facility personnel to perform duties in a way that assures the facility's compliance as required in 725.116(a). There has been no training conducted at the facility since March 21, 1985.

5. Prepare and maintain personnel training records at the facility which document the training and job experience of each person dealing with hazardous waste management and emergency response, as required by 725.116(d)(4). The facility had records of past training conducted (though there has been no recent training).

6. Have a person that will be available or on call with the responsibility of coordinating all emergency response measures. Mr. Frank has received training and is the site's designated primary Emergency Coordinator.

7. Retain manifests at the facility for at least 3 years. This is being complied with.

8. Make arrangements or design modifications to allow for collection of runoff from active portions of the facility. The landfill was found to have erosion channels around the perimeter of the active portion which would indicate surface water runoff is leaving the site.

9. Prepare a map which indicates the exact locations and dimensions, including depth of each cell with respect to permanently surveyed benchmarks and the contents and approximate location of each hazardous waste type within the cells. The map showing the approximate locations of the cells and the information on the "Generator Sheets" are not sufficient to pinpoint the location of hazardous wastes in the landfill.

The situation remains that if the landfill tries to comply with the Court Order, it will not be able to comply with the Consent Agreement and Final Order, and vice versa. The landfill is currently trying to implement the closure plan approved by the Court.

No. 5. Describe any exemptions from the regulations the facility qualifies or may qualify for.

Not applicable.

No. 6. Describe how and why the facility is regulated for the wastes handled.

The owner/operator sent a "Notification of Hazardous Waste Activity" dated August 18, 1989, and a Part A application dated November 18, 1980, to obtain interim status. They have revised the Part A twice since that time -- once in March 4, 1982, and the other April 9, 1983.

The process codes on the latest Part A (April 9, 1983) included the following:

D80 - landfill disposal
S01 - storage in containers
S02 - storage in tanks
T04 - treatment not otherwise specified

Of the above, the facility has only actually conducted a landfill operation. The other process codes were proposed changes that never took place.

No. 7. List any attachments to be included in the inspection report.

Attachment A - A copy of information on the quantity and location of hazardous waste disposed at the landfill. This information was sent to the USEPA Regional Administrator and local zoning authority.

Attachment B - A copy of the landfill's 1987 Facility Annual Report.

Attachment C - A copy of an engineering report by M. Rapps and Associates certifying that the landfill has closed in accordance with the closure/post-closure plan approved by the Circuit Court.

Attachment D - A copy of Brighton Landfill's stream sampling procedures.

No. 8. Summarize the apparent violations.

- 722.111 - A hazardous waste determination has not been made of the landfill's waste oil.

- 725.113(b)(1) - The facility's "Excess Rainwater Analysis/Disposal Plan" for collected precipitation runoff was deemed inadequate because not all of the EP Toxic metals were included in the list of parameters to be analyzed and the wrong standard for cadmium was cited.

- 725.116(c) - Personnel are not receiving annual training.

- 725.212(d)(1) - The facility's closure plan had not been sent to the Agency with the intention of review 180 days prior to the date on which the owner or operator expects to begin closure.

- 725.212(d)(3) - The facility was to have submitted its closure plan to the Agency no later than 15 days after 1) termination of interim status or 2) an issuance of a judicial decree or Board order to cease receiving hazardous waste or close. This had not been done.

- 725.218(e) - The facility's post-closure plan was to have been sent to the Agency at least 180 days before the date on which the owner or operator expects to begin closure or within 15 days after 1) termination of interim status and/or 2) an issuance of a judicial decree or Board order to cease receiving waste or close. This had not been done.

* - 725.242(b) - The facility has not adjusted their closure cost estimate annually.

* - 725.244(b) - The facility has not adjusted their post-closure cost estimates annually.

- 725.402(b) - The facility was not maintaining a runoff management system to collect and control all of the generated runoff.

- 725.409 - The facility had not provided enough information to identify the exact locations of hazardous wastes within the landfill.

* THESE ARE NEW VIOLATIONS. ALL OTHER VIOLATIONS ARE CONTINUING.

No. 9. Provide any other pertinent comments.

It was evident on the inspection that additional cover had been placed on the landfill (see photos 5, 6, 7, 8, 9, 10, 11, 12, 13, and 15). Mr. Frank and Mr. Evans said the entire landfill site has had 2 feet of low permeable cover placed on it. On top of this cover had been placed 2 inches of topsoil. Mr. Frank said the entire covered area has had lime applied to it and then sown with grass seed. According to Mr. Frank, a Circuit Court hearing was held in July of 1988 in which the landfill's representatives indicated that the required cover had been applied.

At the landfill were the following heavy equipment; a Terex 8230 bulldozer, 2 Caterpillar DW15 scrapers, a Terex TS24 scraper, a Fiat Allis 12G-B endloader, an Insley H2000 backhoe and a grader.

Mr. Frank, Jon Cooper and I walked over the landfill during the inspection. The landfill is composed of two areas that have been separately permitted by the IEPA for development and operation. Both sites have received hazardous waste for disposal. For the purpose of describing areas of the landfill (since they are contiguous), the areas will be identified as Site 1 (LPC #1178020001) and Site 2 (LPC #1178020003).

While walking along the south side of Site 1, 2 erosion channels going under the perimeter fence were noted (see photos 2 and 3). The fairly deep channels indicate that water routinely exits the active area to a roadside drainage ditch. Another channel under the fence is shown in Photo 4.

The deep L-shaped trench along the south and west sides of Site 2 has had additional cover placed in it (see photos 6, 7, 8, 9, 10 and 13). The trench now acts as a large ditch or swale to allow runoff to flow to a culvert located at the south end of Site 2. Water runoff was entering the culvert and flowing off-site to a roadside ditch during the inspection. The culvert is reportedly in an area that has not been filled. The area was found to have small trees growing in it (see photo 6).

Just west of the western fill boundary of Site 2 was an area where soil had been removed. Mr. Frank said the soil in this area was scraped off so it could be applied to the landfill as cover (see photos 7, 8, 11, and 12).

The trench located just north of the northern fill boundary of Site 2 has been partially filled with cover material (see photos 11, 12 and 14). Runoff from the north face of Site 2 still flows into the remaining low area on the north side. To prevent the water from being ponded, an opening had been made which allows the water to flow northward toward a creek (see photo 14).

More cover had been placed on the north fill slope of Site 1 (see photo 15). The grade of the fill face was found to be considerably more gentle.

The new creek constructed along the north side of the site was observed (see photos 16 and 18). No leachate flows were noted.

While walking north of the northwest fill region of Site 1, a large erosion channel was observed (see photo 17). There was no refuse or leachate noted in the channel.

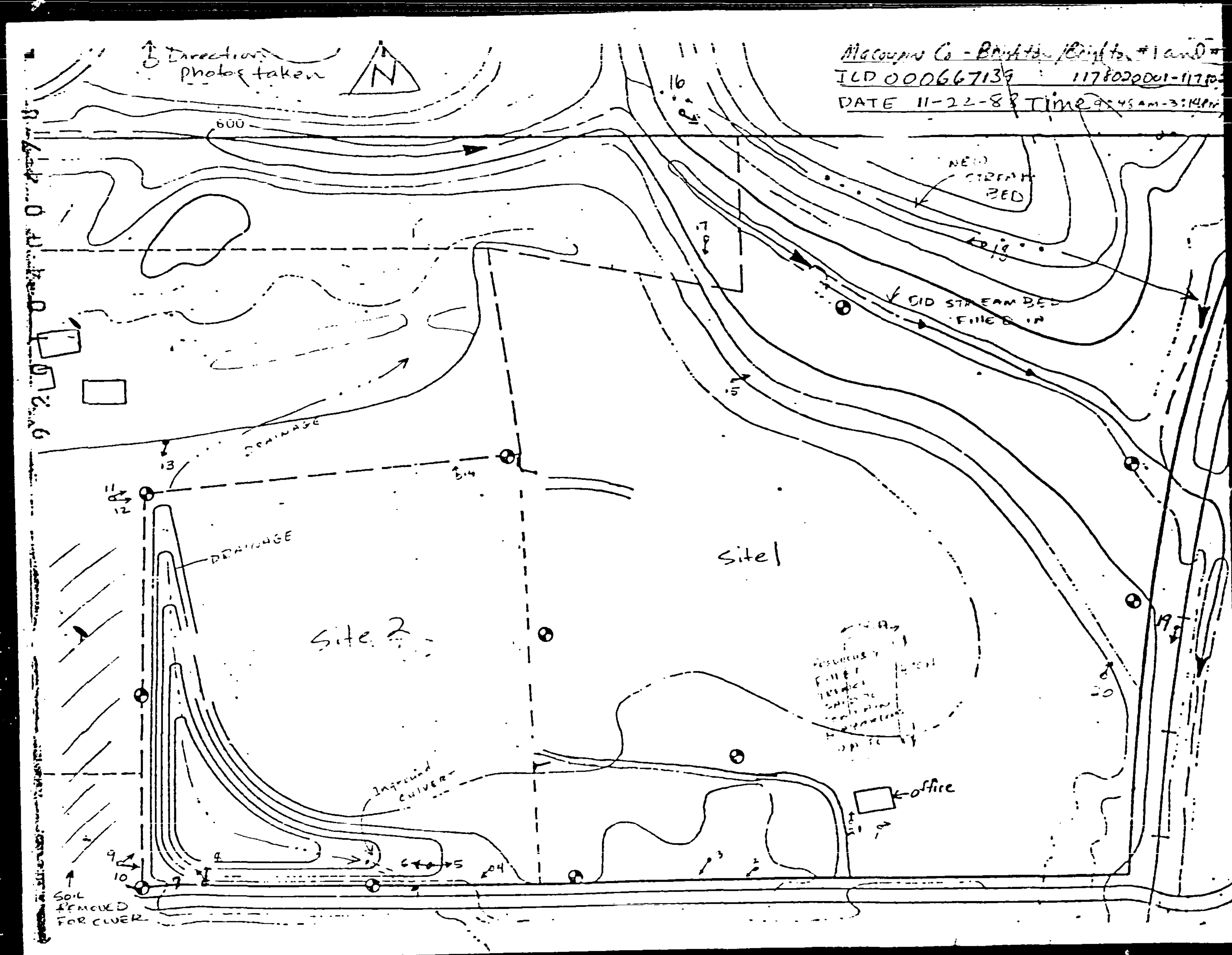
Photo 19 shows the area where the eastern fence has been replaced. A section of the fence had reportedly been stolen on the previous inspection.

Mr. Frank showed us an area north of the office/equipment shed where a trench with hazardous waste was located. The area was covered with weeds, equipment, and metal parts. It was estimated to be about 470 by 140 feet.

The landfill has a septic tank and septic field located north of the office. Mr. Frank said that the septic system is not in a filled area.

RCJ/jg/0094L

cc: DLPC/FOS, Central Region



Macoupin Co - Brighton/Brighton #1 and #
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DATE 11-22-88 Time 9:45 AM-3:14 PM
Direction photos taken
N
600
NEW STREAM BED
OLD STREAM BED FILLED IN
DRAINAGE
DRAINAGE
Site 1
Site 2
Inground culvert
office
SOIL REMOVED FOR CULVER